

**THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

MARK WALTERS

Plaintiff,

v.

OpenAI, L.L.C.,

Defendant.

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Civil Action No. 1:23-cv-03122-
MLB

**JOINT MOTION FOR AN EXTENSION OF TIME TO SUBMIT THE
JOINT PRELIMINARY REPORT AND DISCOVERY PLAN**

Defendant OpenAI, L.L.C., (“Defendant”) and Plaintiff Mark Walters, by and through its undersigned counsel, jointly move this Court for an extension of time to submit the Joint Preliminary Report and Discovery Plan up to and including August 28, 2023. The current deadline is August 14, 2023, and Plaintiff’s counsel has previously requested a leave of absence for a three-week period during this time.

Dated: August 7, 2023

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Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that, on this 7th day of August 2023, I electronically filed the foregoing JOINT MOTION FOR EXTENSION TO SUBMIT THE JOINT PRELIMINARY REPORT AND DISCOVERY PLAN with the Clerk of Court using the CM/ECF system, which will send e-mail notification of such filing to all attorneys of record.

Dated: August 7, 2023

By: /s/ *Brendan Krasinski*
Brendan Krasinski